

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

*In re Hearst Communications State Right of  
Publicity Statute Cases*

Case No. 1:21-cv-08895-RA

Hon. Ronnie Abrams

**PLAINTIFFS' NOTICE OF SUPPLEMENTAL AUTHORITY**

Plaintiffs in this consolidated action respectfully submit this Notice of Supplemental Authority regarding the pending Motion to Dismiss. See ECF Nos. 37-38, 42, 43. Plaintiffs bring to the Court's attention the Northern District of California's order in *Kellman v. Spokeo, Inc.*, 2022 WL 1157500 (N.D. Cal. Apr. 19, 2022) (Orrick, J.) ("*Kellman*"), attached hereto as Exhibit A. The *Kellman* order was issued subsequent to Plaintiffs' submission of their memorandum in opposition to Defendant's Motion to Dismiss, and thus was not included in Plaintiffs' briefing.

The *Kellman* order is relevant to the parties' respective arguments in the pending motion to dismiss in the instant action. *Kellman* analyzes claims under several of the statutes at issue in this case, and additionally addresses Judge Chen's order in *Brooks v. Thomson Reuters Corp.*, 2021 WL 3621837 (N.D. Cal. Aug. 16, 2021).

Dated: June 22, 2022

Respectfully submitted,

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*\*Pro hac vice application forthcoming*

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